

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SUSQUEHANNA RADIO LLC §
§
Plaintiff §
§
§
v. § **CIVIL ACTION NO. 3:23-CV-01746-S**
§
JACOB KEMP and DANIEL McDOWELL §
§
Defendants §

DEFENDANTS' MOTION FOR LEAVE TO EXCEED PAGE LIMIT

1. Defendants move for leave to exceed the page limit from the local rules for purposes of briefing their 12(b) motions.
2. Because Plaintiff has alleged breach of contract claims for many provisions of Defendants' employment contracts – each with its own set of National Labor Relations Act authority – extensive briefing is required to explain why each of the claims is preempted by the exclusive jurisdiction of the National Labor Relations Board.

Respectfully submitted,

/s/ Philip Kingston
Texas Bar No. 24010159
Sheils Winnubst PC
1701 N. Collins, 1100 Atrium II
Richardson, Texas 75080
(214) 642-1707
philip@sheils Winnubst.com

Matthew Bruenig
District of Columbia Bar No. 1045571
124 4th St.
Stamford, Connecticut 06905
(857) 540-1205
matthewbruening@gmail.com

FRANK G. CAWLEY
Texas Bar No. 24006978
frank@cawleylawgroup.com
CAWLEY LAW GROUP, L.L.C.
2591 Dallas Parkway, Suite 300
Frisco, Texas 75034
(469) 259-2221 Telephone

Elizabeth F. Griffin
Texas Bar No. 24092450
Clark Hill PLC
901 Main Street, Suite 6000
Dallas, Texas 75202
214-651-4300
214-659-4330 (Fax)
egriffin@clarkhill.com

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

Counsel for Defendants requested Plaintiff's counsel's agreement to this motion via e-mail on September 11th, 2023. No response was received.

/s/ Philip Kingston